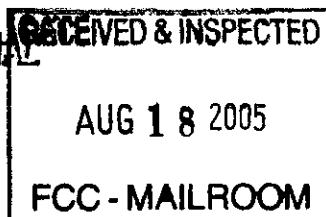


Subj: **Docket # 99-325; Concerns re HD/IBOC; PVZ; 13 1845Z AUG 05**
 Date: 8/13/05 11:46:58 AM Pacific Daylight Time
 From:
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7245 Manasota Key Road
 Englewood, FL, 34223-9306
 13 August, 2005



Federal Communications Commission
 445 12th Street, SW
 Washington, D.C., 20554

RE: 99-325, Docket #,

VIA ELECTRONIC AND GENERAL U.S. MAIL

Dear Commissioners;

This letter expresses concern about IBOC/HD's destructive - illegal under all other circumstances - interference. Promoters tout HD benefits yet ignore interference objections. They claim total industry support, questionable on its face. They dismiss the public, whose interest they and the FCC serve. Why so little public awareness of HD, much less demand? Why not encourage public demand? Friends in medicine, law, and business note HD's monopolistic bent. As do I, they ask why in an era of 'solutions', is interference part of the finished product? Why would the FCC approve the equivalent of jamming? HD backers elegantly dismiss harmful interference as 'unavoidable third adjacent noise blooms'. None with whom I spoke are so blase, as now they can't hear desired broadcasts due to HD stations. Giving HD the unearned benefit of nighttime propagation will demolish AM. The future of AM and FM radio hinges upon your integrity.

Previous improvements were backward compatible. In Providence, RI, three adjacent channels, 4, 5, and 6 are well received. Were one to justify interference, pleading 'inevitable adjacent channel noiseblooms' the public would see this as cheating. Fines, loss of license might ensue. Do Ibiquity and 'partners' believe they can do as others can not?

Will the FCC knowingly render useless hundreds of millions of extant analog radios? Would FCC tell the public, buy Ibiquity licensed radios, or do without? Is this what Ibiquity wants? According to reports, Robert J. Struble is unhappy that the transition to all digital won't occur as quickly as he wishes. Why should it occur at all? HD cheerleaders ask the FCC to truncate the comment period. Wouldn't they benefit from open discussion among all parties, public included?

FCC has long served the public and broadcasters of all stature by eliminating RF interference. It is thus unsettling that Ibiquity declares 'we could lose half the AM stations and not miss them'. Which ones? Those jammed by 'noise blooms'? Stations which proved vital to public safety during the 2004 hurricanes? Television stations relayed their audio via AM outlets big and small to those affected by the storms, when televisions went out with the lights. AM radio demonstrated that a lo-tech established system is the most efficient means to transmit vital information to great numbers of citizens. Will they now be denied such information due to 'inevitable noise blooms'? HD seems an ill conceived, "rushed to market" relic from the 1990's, rendered obsolete by subsequent technological developments. If interference is of no consequence, why do HD promoters thwart discussion of it and ridicule of those who do?

FM stations have for decades broadcast SCA signals. TV stations broadcast closed captions. AM stereo has no ill effects. Ibiquity touts 'traffic and weather texting streams' as great innovations. If not damage to spectrum, have they at least considered the ironic safety hazard caused by drivers watching 'traffic texting' on HD radios, rather than the road?

This isn't about being opposed to IBOC/HD. Ibiquity, the NAB, and others seek your approval of a system which allows some increase in data throughput at great cost to spectrum, broadcasters, and the public. Unprecedented, as previous innovations all were judged by increased flow of information through reduced spectrum.

If Ibiquity wants to honestly claim it's system is 'in band and on channel', then perhaps it should bid on higher frequency spectrum and spare AM and FM its dubious benefits. Ibiquity's system is all over the band and destructive to multiple channels. How did this system gain this much ground without benefit of undue influence?

Respectfully submitted,

Paul V. Zecchino

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Saturday, August 13, 2005 America Online: Milspec390